

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

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THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

Civil Action No. 4:20-cv-00957-SDJ

GOOGLE LLC,

Defendant.

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## **EXHIBIT B**

**PLAINTIFF STATES' OPENING BRIEF TO THE SPECIAL MASTER  
FOR THE APRIL 4, 2024 HEARING**

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**From:** Geraldine W. Young  
**Sent:** Tuesday, March 26, 2024 9:05 AM  
**To:** MCCALLUM, Robert; Zeke DeRose III; MAHR, Eric (EJM); ELMER, Julie (JSE); Bryce Callahan; Paul Yetter; John Harkrider; Daniel Bitton; Bracewell, Mollie; KAPLIN, Lauren Marc B. Collier; Jonathan Wilkerson; John McBride; Peter M. Hillegas; Noah Heinz; Trevor Young  
**Subject:** RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)  
**Attachments:** 2024.03.19 - Texas v. Google - Chats with Missing Metadata.xlsx

Counsel,

We are following up on our request below regarding continued missing metadata for certain Google chats, identified in the attached excel sent last week. Given the upcoming depositions next week, please let us know the status of these immediately today.

Please also confirm by Thursday, March 28, that Google has produced all relevant, responsive chats for the Google deponents, noticed by the States under Rule 30(b)(1), as well as other Google custodians, with the exception of the forthcoming DTPA productions.

Thank you, Geraldine

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**From:** Geraldine W. Young  
**Sent:** Tuesday, March 19, 2024 12:39 PM  
**To:** MCCALLUM, Robert <rob.mccallum@freshfields.com>; Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; Bryce Callahan <bcallahan@yettercoleman.com>; Paul Yetter <pyetter@yettercoleman.com>; John Harkrider <jharkrider@axinn.com>; Daniel Bitton <dbitton@axinn.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; KAPLIN, Lauren <lauran.kaplin@freshfields.com>  
**Cc:** Marc B. Collier <marc.collier@nortonrosefulbright.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Trevor Young <Trevor.Young@oag.texas.gov>  
**Subject:** RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

Rob,

Regarding the list of Google Chat bates numbers that you sent in your email below, we have identified Chats in that list that are still missing metadata that Google has produced for other Chats and that Google indicated at the March 7 Special Master hearing were extractable for Chats. The categories of missing metadata and the number of documents are outlined in the below chart, and the specific bates of the Chats with missing metadata are listed in the attached Excel. Please let us know if Google can provide these missing metadata (that, again, have been produced for other Chats). We are still analyzing on our end so may follow up with some additional Chats that are missing these metadata fields.

Missing Metadata Field	Number of Documents/Chats Missing Metadata

Rev Recipient	180 (excluding attachments)
Rev From	172 (excluding attachments)
Master Date	1,676

Thanks, Geraldine

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**From:** MCCALLUM, Robert <[rob.mccallum@freshfields.com](mailto:rob.mccallum@freshfields.com)>  
**Sent:** Friday, March 1, 2024 3:41 PM  
**To:** Zeke DeRose III <[Zeke.DeRose@LanierLawFirm.com](mailto:Zeke.DeRose@LanierLawFirm.com)>; MAHR, Eric (EJM) <[Eric.MAHR@freshfields.com](mailto:Eric.MAHR@freshfields.com)>; ELMER, Julie (JSE) <[Julie.Elmer@freshfields.com](mailto:Julie.Elmer@freshfields.com)>; Bryce Callahan <[bcallahan@yettercoleman.com](mailto:bcallahan@yettercoleman.com)>; Paul Yetter <[pyetter@yettercoleman.com](mailto:pyetter@yettercoleman.com)>; John Harkrider <[jharkrider@axinn.com](mailto:jharkrider@axinn.com)>; Daniel Bitton <[dbitton@axinn.com](mailto:dbitton@axinn.com)>; Bracewell, Mollie <[mbracewell@yettercoleman.com](mailto:mbracewell@yettercoleman.com)>; KAPLIN, Lauren <[lauren.kaplin@freshfields.com](mailto:lauren.kaplin@freshfields.com)>  
**Cc:** Marc B. Collier <[marc.collier@nortonrosefulbright.com](mailto:marc.collier@nortonrosefulbright.com)>; Jonathan Wilkerson <[Jonathan.Wilkerson@LanierLawFirm.com](mailto:Jonathan.Wilkerson@LanierLawFirm.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; John McBride <[john.mcbride@nortonrosefulbright.com](mailto:john.mcbride@nortonrosefulbright.com)>; Peter M. Hillegas <[peter.hillegas@nortonrosefulbright.com](mailto:peter.hillegas@nortonrosefulbright.com)>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto:Noah.Heinz@kellerpostman.com)>; Trevor Young <[Trevor.Young@oag.texas.gov](mailto:Trevor.Young@oag.texas.gov)>  
**Subject:** RE: Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

**[External Email – Use Caution]**

Counsel –

Please see attached.

Kind regards,  
 Rob

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**From:** Zeke DeRose III <[Zeke.DeRose@LanierLawFirm.com](mailto:Zeke.DeRose@LanierLawFirm.com)>  
**Sent:** Monday, February 26, 2024 2:12 PM  
**To:** MAHR, Eric (EJM) <[Eric.MAHR@freshfields.com](mailto:Eric.MAHR@freshfields.com)>; ELMER, Julie (JSE) <[Julie.Elmer@freshfields.com](mailto:Julie.Elmer@freshfields.com)>; Bryce Callahan <[bcallahan@yettercoleman.com](mailto:bcallahan@yettercoleman.com)>; Paul Yetter <[pyetter@yettercoleman.com](mailto:pyetter@yettercoleman.com)>; John Harkrider <[jharkrider@axinn.com](mailto:jharkrider@axinn.com)>; Daniel Bitton <[dbitton@axinn.com](mailto:dbitton@axinn.com)>; MCCALLUM, Robert <[rob.mccallum@freshfields.com](mailto:rob.mccallum@freshfields.com)>; Bracewell, Mollie <[mbracewell@yettercoleman.com](mailto:mbracewell@yettercoleman.com)>; KAPLIN, Lauren <[lauren.kaplin@freshfields.com](mailto:lauren.kaplin@freshfields.com)>  
**Cc:** Marc B. Collier <[marc.collier@nortonrosefulbright.com](mailto:marc.collier@nortonrosefulbright.com)>; Jonathan Wilkerson <[Jonathan.Wilkerson@LanierLawFirm.com](mailto:Jonathan.Wilkerson@LanierLawFirm.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; John McBride <[john.mcbride@nortonrosefulbright.com](mailto:john.mcbride@nortonrosefulbright.com)>; Peter M. Hillegas <[peter.hillegas@nortonrosefulbright.com](mailto:peter.hillegas@nortonrosefulbright.com)>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto:Noah.Heinz@kellerpostman.com)>; Trevor Young <[Trevor.Young@oag.texas.gov](mailto:Trevor.Young@oag.texas.gov)>  
**Subject:** Meet and Confer Follow-up: The State of Texas, et al. v. Google LLC, Case No. 4:20-cv-00957-SDJ (E.D. Tex.)

Counsel,

I have attached a letter regarding our Meet and Confer on Friday related to the States' requests for chats, unredacted transcripts and exhibits from the DOJ Search trial, and requests for production related to state-law DTPA claims.

We look forward to continued conversation.

Zeke



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